

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST LITIGATION

No. 0:18-cv-01776-JRT-HB

This Document Relates To:  
DIRECT PURCHASER PLAINTIFF  
ACTIONS

**DECLARATION OF BOBBY POUYA IN SUPPORT OF DIRECT PURCHASER  
PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR PROTECTIVE  
ORDER CONCERNING EX PARTE LAWYER COMMUNICATIONS**

Bobby Pouya declares:

1. I am a partner in the firm of Pearson, Simon & Warshaw, LLP, Co-Lead Counsel for Direct Purchaser Plaintiffs along with Lockridge Grindal Nauen P.L.L.P (collectively “DPP Co-Lead Counsel”).
2. On October 15, 2019 Direct Purchaser Plaintiffs were served with a copy of Defendants’ Motion for Protective Order Concerning Ex Parte Lawyer Communications (“Motion”) via ECF.
3. Direct Purchaser Plaintiffs were not contacted by Defendants in any manner prior to the filing of the Motion. Thus, Defendants’ Meet and Confer Statement asserting compliance with Local Rule 7.1(a), which requires a meet and confer prior to the filing of a motion, is inaccurate.
4. DPP Co-Lead Counsel have not hired or authorized any investigator or other person to contact the current employees of the Defendants in connection with this lawsuit.
5. The Direct Purchaser Plaintiffs do not have any involvement in the conduct complained of in the Motion and should be excluded from the Motion or any relief arising therefrom.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 15, 2019, at Sherman Oaks, California.

/s/ Bobby Pouya  
Bobby Pouya